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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re:

Case No. 09-43732 WJL

**ROBERT EARL HADDEN, SR. and
PATRICIA LIPSCOMB HADDEN,**

Chapter 13

Debtors.

**REQUEST TO ENTER JUDGMENT
VOIDING THE THIRD AND FOURTH
LIENS OF CHASE AS SUCCESSOR TO
WASHINGTON MUTUAL BANK AND ITS
SUCCESSORS IN INTEREST**

Debtors Robert and Patricia Hadden ("Debtors") hereby request the court enter a judgment voiding the third and fourth liens of Chase as successor to Washington Mutual Bank and its successors in interest ("Chase") secured against Debtors' property located at 7886 Sunkist Drive, Oakland, CA 94605 ("the property").

1. This request is based on the petition, schedules, and documents on file herein, the Motion to Value the Second Lien of Bank of America, N.A. and the Third and Fourth Liens of Chase as Successor to Washington Mutual, Memorandum of Points and Authorities in Support of the Motion and Declaration of Debtor in Support of the Motion filed on September 23, 2011, and subsequent Order Valuing the Lien of Second

1 Lien of Bank of America, N.A. and the Third and Fourth Liens of Chase
2 as Successor to Washington Mutual entered on December 6, 2011.

3 2. On August 6, 2009, Debtors' chapter 13 plan, which stated
4 Debtors' intention to strip the liens of Washington Mutual from their
5 residence, was confirmed. Chase is the successor to Washington
6 Mutual.

7 3. On June 16, 2011, an Order was entered modifying the Chapter
8 13 Plan to state Debtors' intention to strip the lien of Bank of
9 America from their residence which was previously inadvertently
10 omitted.

11 4. On May 4, 2012, an Order was entered modifying the Chapter 13
12 Plan to change Debtors' election to have the property of the estate
13 pertaining solely to the Property not revert in the Debtors upon
14 confirmation of the plan.

15 5. On May 23, 2014, a Notice of Plan Completion and Request for
16 Discharge was filed.

17 6. On May 27, 2014, an Order Discharging 13 Debtor After Plan
18 Completion was entered.

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20 Based on the foregoing, Debtors pray that:

21 1. The court will enter an appropriate form of judgment
22 determining the liens to be entirely, permanently, and for all
23 purposes void and unenforceable.

24
25 Dated: May 29, 2014

/s/ Anne Y. Shiau
ANNE Y. SHIAU
Attorney for Debtors